

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

B. JEAN WEBB,)	
Plaintiff,)	
)	
v.)	Case No. 98-3306-CV-S-RGC-ECF
)	
CITY OF REPUBLIC, MISSOURI,)	
Defendant.)	

DECLARATION OF FRED L. SLOUGH

1. I, Fred L. Slough, have been in the private practice of law since my graduation from the U.M.K.C. School of Law in 1974. I am admitted to practice in the State of Missouri, the United States District Court for the Western District of Missouri, the United States Court of Appeals for the Eighth Circuit, and the United States Supreme Court.

2. My partners and I have a general practice of law. My own work has become more and more concentrated on civil rights and personal injury cases. I estimate that civil rights cases make up at least fifty percent of my practice. I also serve as an arbitrator and mediator in employment discrimination cases, among others, and I am on various alternative dispute resolution panels including the American Arbitration Association panel. I have worked on numerous cases involving constitutional rights. All of my cases involve litigation or the possibility of litigation. I have substantial trial experience, including approximately twenty jury trials.

3. As a result of my twenty-five years of professional experience, I am personally familiar with the billing practices of litigation firms and attorneys in the Western District of Missouri and in the Kansas City Metropolitan Area, in particular. I am also familiar with Mr. Bonney's experience, qualifications, and abilities in handling constitutional civil rights litigation, having worked

with him as co-counsel in several cases. Attorneys in the Kansas City Metropolitan Area who have experience similar to Mr. Bonney's routinely bill for their work at rates ranging from \$150.00 per hour to \$205.00 per hour. Thus, the rate of \$150.00 per hour that he seeks in this case is well within the market range for attorneys with his experience.

4. I also believe that the 224 total hours expended by Mr. Bonney in litigating this case thus far are reasonable given the complexity of the constitutional issues involved. The hours and fees requested are also consistent with the time necessary to litigate a First Amendment case to judgment and are consistent with the hours I have spent litigating other such cases.

5. During my years of practice, I have tried to locate attorneys in southwest Missouri to handle plaintiff's civil rights cases, either as local counsel or as lead counsel. However, it is difficult to find qualified, experienced attorneys in that region who are willing and able to take such cases. Thus, I believe it would have been difficult or impossible for plaintiff to find a local attorney who was competent and willing to handle a First Amendment case of this type.

I declare under penalty of perjury that all of the foregoing statements are true and correct.

s/ Fred L. Slough
Fred L. Slough
Slough, Connealy, Irwin & Madden